

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT
CINTRON TO GREETING CARD ASSOCIATION INTERROGATORY GCA/USPS-T2-
2(b) REDIRECTED FROM POSTAL SERVICE WITNESS WHITEMAN
(GCA/USPS-T2-2(b))
(May 26, 2021)**

The United States Postal Service hereby provides its responses to the Greeting Card Association's ("GCA") Interrogatory 2(b) to United States Postal Service Witness Whiteman, redirected to Witness Cintron, issued on May 19, 2021. Each question is stated verbatim and followed by the response.¹

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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¹ The Postal Service believes that GCA has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate GCA in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by GCA on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

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May 26, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CINTRON
(REDIRECTED FROM WITNESS WHITEMAN) TO GREETING CARD ASSOCIATION
INTERROGATORIES**

GCA/USPS-T1-2(b): Did you, or to your knowledge, anyone within the Postal Service or among its consultants, investigate whether savings in the NDC network could be achieved by changing the service standards for some or all of the mail using that network? If your answer is affirmative, please state briefly whether or not that investigation found potential savings. If your answer is negative, please provide your understanding of why no such investigation was undertaken.

RESPONSE:

Some investigation was completed to review potential savings of adjusting service standards of volumes using the NDC network by identifying additional opportunities to shift volumes from highway transportation to rail transportation. The investigation found little opportunity for savings. There will be opportunity for additional savings by consolidating the NDC network and preferential networks. The First-Class Mail service standard change and development of a long-reach surface preferential network is a prerequisite for the consolidation of the two networks to occur.